

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Effectively Illuminated Pathways LLC,

Plaintiff,

v.

**Aston Martin Lagonda of North America, Inc.,
et al.,**

Defendants.

Civil Action No. 6:11-cv-00034-LED

JURY TRIAL DEMANDED

ANSWER TO MASERATI'S COUNTERCLAIMS

Plaintiff Effectively Illuminated Pathways LLC ("EIP") answers the counterclaims of defendant Maserati North America, Inc. ("Maserati") (Dkt. No. 50) as follows:

1. EIP admits that Maserati is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business located at 250 Sylvan Avenue, Englewood Cliffs, New Jersey 07632. EIP denies the remaining allegations of paragraph 1.

2. Admitted.

JURISDICTION AND VENUE

3. Admitted.

4. Admitted.

COUNT ONE: DECLARATORY JUDGMENT OF NON-INFRINGEMENT

5. EIP incorporates by reference its answers set forth in paragraphs 1 through 4 above as if fully set forth herein.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted.

10. Admitted.

11. Denied.

COUNT TWO: DECLARATORY JUDGMENT OF PATENT INVALIDITY

12. EIP incorporates by reference its answers set forth in paragraphs 1 through 11 above as if fully set forth herein.

13. Admitted.

14. Admitted.

15. Denied.

PRAYER

To the extent necessary, EIP denies that Maserati is entitled to the relief requested at the conclusion of its counterclaims, or any relief whatsoever.

DEMAND FOR JURY TRIAL

EIP demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: April 29, 2011

By: /s/ Bruce D. Kuyper
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Attorneys for Plaintiff,
Effectively Illuminated Pathways LLC

CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on April 29, 2011 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

Dated: April 29, 2011

/s/ Bruce D. Kuyper

Bruce D. Kuyper